

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FUJIAN MINGTA TOYS CO. LTD.,

*Plaintiff,*

v.

THE PARTNERSHIPS and  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE “A”,

*Defendants.*

Civil Action No. 1:24-cv-05625

**PLAINTIFF’S *EX PARTE* MOTION TO EXTEND THE SEALED TEMPORARY  
RESTRAINING ORDER**

Plaintiff Fujian Mingta Toys Co. Ltd. (“Plaintiff”) respectfully moves to extend the Sealed Temporary Restraining Order (Dkt. No. 11) an additional fourteen days, through and including January 7, 2024.

Federal Rule of Civil Procedure 65(b)(2) states that an ex parte temporary restraining order “expires at the time after entry—not to exceed 14 days—that the court sets, unless before that time the court, for good cause, extends it for a like period” and that the “reasons for an extension must be entered into the record.” Fed. R. Civ. P. 65(b)(2).

Here, good cause exists to extend the TRO an additional fourteen days as Plaintiff is dependent upon yet to be produced third party discovery. The TRO was entered on December 10, 2024, and is set to expire by its own terms on December 24, 2024. Since the entry of the TRO, Plaintiff has worked diligently to comply with the terms of the Order, including providing actual notice of the TRO on Amazon.com Inc. (“Amazon”), WhaleCo Inc. dba TEMU (“TEMU”), and Walmart Inc. for expedited discovery to ascertain the electronic mail addresses of the Defendants, among other discoverable information. *See* Exhibit 1. Amazon and TEMU has confirmed receipt

of the TRO yet have not yet responded with the production. Only Walmart has produced the requested data. Therefore, due to Plaintiff's dependence on information from Amazon and TEMU, Plaintiff requires more time to provide notice of these proceedings in accordance with the terms of the TRO. Furthermore, the immediate and irreparable harm that Plaintiff will suffer without *ex parte* injunctive relief as outlined in the TRO remains. In light of this, Plaintiff respectfully moves to extend the TRO an additional fourteen days, through and including January 7, 2024.

DATED: December 18, 2024

Respectfully submitted,

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